

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section C - V. Reporting Requirements	a) The permittee shall notify the Department, within seven (7) days, of any/all deviations from the requirements of Conditions #001, #002, #003 & #004, above, and any corrective action(s) taken.b) The 6-month deviation report, required under Section B Condition #023, shall be submitted to the De	February 16, 2005. Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.21] (Emission statements)	Section C - V. Reporting Requirements	a) Except as provided in subsection (d), this section applies to stationary sources or facilities: (1) Located in an area designated by the Clean Air Act as a marginal, moderate, serious, severe or extreme ozone nonattainment area and which emit oxides of nitrogen or VOC. (2) Not located	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.3] (Reporting)	Section C - V. Reporting Requirements	a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously repo	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §135.4] (Report format)	Section C - V. Reporting Requirements	Source reports shall contain sufficient information to enable the Department to complete its emission inventory. Source reports shall be made by the source owner or operator in a format specified by the Department.	AMS Reports submitted on time and on the forms supplied by the Department.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of certain fugitive emissions)	Section C - VI. Work Practice Standards	A person responsible for any source specified in Section C, Condition #001, above, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following: (1) Use, where possible, of water or chemicals for contr	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.511] (Monitoring and	Section C - VI. Work Practice Standards	The procedure for evaluating and reporting the observation of fugitive, fugitive particulate, visible and malodorous events shall be provided to any employee who is responsible for the	Company Policy. Note: The Wayne Combustion Turbine ceased operations	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Certification of Continuous or Intermittent Compliance  
20-00265 - RELIANT ENERGY MID A/WAYNE COMBUSTION TURBINE SITE

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
related recordkeeping and reporting requirements.)		operation of any source identified in this permit. Appropriate corrective action shall be taken to ensure compliance	on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	
[25 Pa. Code §129.14] (Open burning operations)	Section C - VII. Additional Requirements	a) Not applicable b) Outside of air basins. No person may permit the open burning of material in an area outside of air basins in a manner that: (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is b	Station Operations policy forbids open burning.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
036 - COMBUSTION TURBINE [25 Pa. Code §123.13] (Processes)	Section D - I. Restrictions - Emission Restriction(s)	a) Subsections (b) and (c) apply to all processes except combustion units, incinerators and pulp mill smelt dissolving tanks. b) Not applicable c) For processes not listed in subsection (b)(1), including but not limited to, coke oven battery waste heat stacks and autogeneous zinc coker waste heat	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
036 - COMBUSTION TURBINE [25 Pa. Code §123.21] (General)	Section D - I. Restrictions - Emission Restriction(s)	a) This section applies to sources except those subject to other provisions of this article, with respect to the control of sulfur compound emissions. b) No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxide	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
036 - COMBUSTION TURBINE [25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section D - I. Restrictions - Fuel Restriction(s)	The permittee shall monitor the sulfur content of the #2 fuel oil burned to ensure that the sulfur content does not exceed 0.5% by weight at any time.	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
036 - COMBUSTION TURBINE [25 Pa. Code §127.441] (Operating permit terms and	Section D - I. Restrictions - Operating Hours Restriction(s)	Authority for this condition is also derived from 25 PA Code 129.93. The source shall not exceed an annual capacity factor of 5%. The annual capacity factor (CF) shall be calculated as follows: [Calendar year net electric power generation (MWH)] X [100]CF = -----	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

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conditions.)			application submitted to the Department of February 16, 2005.	
036 - COMBUSTION TURBINE [25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section D - II. Testing Requirements	The heat content and sulfur content (% by weight) in the fuel oil shall be tested quarterly using the procedures specified in 25 PA Code 139.16, except if no oil was delivered during the quarter.	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
036 - COMBUSTION TURBINE [25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section D - III. Monitoring Requirements	a) The permittee shall monitor the operating conditions for excursions which are related to the potential for excess stack opacity through the use of a computerized control system. A forced normal shutdown or a trip of the turbine, initiated by the control system due to indications of combustor ba	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
036 - COMBUSTION TURBINE [25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section D - IV. Recordkeeping Requirements	a) The permittee shall maintain records of the following:1. Hours of operation on a monthly basis2. Power rating on a monthly basis3. Fuel usage/heat input on a monthly basis4. Quarterly fuel oil test results for sulfur content (% by weight) and heat contentb) The permittee shall mainta	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
036 - COMBUSTION TURBINE [25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section D - V. Reporting Requirements	a) The permittee shall notify the Department, within ten (10) working days of receipt of test results, if the sulfur content of the fuel exceeds 0.5% by weight. The notification shall include the following:1. Sulfur content of the fuel (% by weight)2. SOx emissions rate (ppmv) based on the maxi	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
036 - COMBUSTION TURBINE [25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section D - VI. Work Practice Standards	The source shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.[Compliance with the requirement specified in this streamlined permit condition assures compliance with the provisions in Revised RACT Approv	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

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related recordkeeping and reporting requirements.) 036 - COMBUSTION TURBINE [25 Pa. Code §127.441] (Operating permit terms and conditions.)		a) The permittee shall comply with the following requirements: 1. NOx Account: 25 PA Code 145.10 - 14.2. Accounting Process for Deposit, Use and Transfer of Allowance: 25 PA Code 145.50 - 57.3. NOx Allowance Transfers: 25 PA Code 145.60 - 62.4. Opt-In Process: 25 PA Code 145.80 - 88.b) T	May 1, 2004. ERC application submitted to the Department of February 16, 2005. Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
036 - COMBUSTION TURBINE [25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section D - VII. Additional Requirements	The permittee shall maintain the following charts to show compliance with the particulate and sulfur oxides emission limitations, above: 1. A chart comparing the net power output (kW) of the turbine to the exhaust SO2 concentration (ppm) 2. A chart comparing the net power output (kW) of the turbine	Company Policy. Note: The Wayne Combustion Turbine ceased operations on February 11, 2004 and was permanently retired on May 1, 2004. ERC application submitted to the Department of February 16, 2005.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY

## AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW SUPPLEMENTAL FORM

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

Date of submission of original Compliance Review form: July 19, 1999

Type of Supplemental Compliance Review Form Submittal (check all that apply):

- |  |   |
|--|---|
| <input type="checkbox"/> Original Filing | <input checked="" type="checkbox"/> Amended Filing  |
| <input type="checkbox"/> No Changes      | <input checked="" type="checkbox"/> Date of Last Compliance Review Form Filing<br><b>December 21, 2004 (Title V Semi-Annual Report)</b> |

Type of Submittal:

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> New Plan Approval          | <input type="checkbox"/> New Operating Permit | <input type="checkbox"/> Renewal of Operating Permit                          |
| <input type="checkbox"/> Extension of Plan Approval | <input type="checkbox"/> Change of Ownership  | <input checked="" type="checkbox"/> Periodic Submission<br>(every six months) |
| <input type="checkbox"/> Other _____                |   |   |

A. General Applicant Information:

1. Name of Applicant/Permittee/ ("applicant") (non-corporations attach documentation of legal name):

Reliant Energy Mid-Atlantic Power Holdings, LLC

Address: 121 Champion Way, Suite 200

Canonsburg, PA 15317

Telephone: (724)-597-8000

Taxpayer ID #: 52-2154847

**Permit, Plan Approval or Application ID #:** Wayne Title V Permit No. 20-00265

2. Identify the form of management under which the applicant conducts its business (check appropriate box):

- |  |  |                                      |
|--|--|--------------------------------------|
| <input type="checkbox"/> Individual          | <input type="checkbox"/> Fictitious Name   | <input type="checkbox"/> Association |
| <input type="checkbox"/> Municipality        | <input type="checkbox"/> Partnership   | <input type="checkbox"/> Syndicate   |
| <input type="checkbox"/> Proprietorship      | <input type="checkbox"/> Limited Partnership   |                                      |
| <input type="checkbox"/> Public Corporation  | <input type="checkbox"/> Government Agency   |                                      |
| <input type="checkbox"/> Private Corporation | <input type="checkbox"/> Joint Venture   |                                      |
| <input type="checkbox"/> Municipal Authority | <input checked="" type="checkbox"/> Other Type of Business (specify)<br><b>Limited Liability Company</b> |                                      |

3. Describe the type(s) of business activities performed:

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission

No Change

B. General Information Regarding "Applicant." If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
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\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission

No Change

No Change

No Change

No Change

No Change

In February 2002, the assets of Orion Power Holdings, Inc were acquired by Reliant Resources, Inc. Refer to Attachment A to understand corporate relationships.

C. Specific information regarding the applicant and its "related parties:

1. Pennsylvania Facilities. List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Business	County and Municipality	Telephone No.	Relationship to Applicant
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\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission  
No Change

2. Provide the names and business addresses of all general partners of the applicant and parent corporation, if any.

Name	Business Address
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\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission  
No Change No Change

3. List the names and business of persons with overall management responsibility for the process being permitted (i.e., plant manager)

**Name**

**Business Address**

\* \* \* Supplemental \* \* \*

List only those changes since the date of the last original submission

No Change

No Change

4. Plan Approvals or Operating Permits. List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time five years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

<b>Source</b>	<b>Plan Approval Operating Permit Number</b>	<b>Location</b>	<b>Issuance Date</b>	<b>Expiration Date</b>
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\* \* \* Supplemental \* \* \*

List only those changes since the date of the last original submission

See Amended Attachment 1

**Plan Approvals or Operating Permits**



D. Compliance Background:

(Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.)

1. List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit #	Nature of Documented Conduct	Type of Department Action	Status Litigation; Existing/Continuing; or Corrected/Date	Dollar Amount Penalty
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\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission.

No Change

**CONTINUING OBLIGATION:** Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional documented conduct occur or related parties develop between the date of submission and Department action on its application.

2. List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

DATE	LOCATION	PLAN APPROVAL/ OPERATING PERMIT #	NATURE OF DEVIATION	INCIDENT STATUS: EXISTING/CONTINUING; OR CORRECTED DATE,
*** Supplemental ***				
List only those changes since the date of the last original submission				
06/5/05	Hunterstown	Plan Approval No. 01-05029	CT301 CO emissions exceeded the 10.0 ppm limit for 1 hour	The exceedance occurred while the unit was operating at a load range of 110 - 135 megawatts. General Electric was contacted on June 6, 2005 to evaluate and resolve the problem.
05/18/05	Conemaugh	TV-32-00059	Fugitive dust emissions from the truck receiving operation crossed the property boundary and visible emissions were observed from the coal sampler auger	NOV received from PaDEP dated 5/24/05. Deviation of 25 Pa Code 123.1  Control plan requested and submitted during a meeting at DEP Greensburg office on 6/7/05. Control plan implementation in progress. Followup inspection to be scheduled by DEP. Resolution of NOV to be determined.
05/12/05	Hunterstown	Plan Approval No. 01-05029	* CT-201 exceeded Cold Startup time * CT301 NOx emissions exceeded the 3.5 ppm limit for 3 hours * CT301 CO emissions exceeded the 10.0 ppm limit for 2 hours	These exceedances were the result of plant process malfunctions that occurred during the first startup event following the station's annual inspection outage and have since been corrected.
05/09/05	Shawville	TVOP 17-00001 Sec. C/#001	Ash silo leak caused visible emissions from fly ash unloading room. Access door leak caused the problem.	Leak was discovered at 09:15 and was stopped by shutting down the fluidizing blower at 10:45. Bracing was added to stop the leaking door. Door will be permanently repaired by 5/30/05. Affected area was cleaned by a contract vacuum truck.  Incident reported to Bruce Vandergrift of DEP via telephone immediately following discovery.
05/07/05	Seward	32-00040 Section C Condition #001	2B ash line "T" failure.  Visible particulate emissions from ash transport line.	Duration of leak approximately 09:45 to 10:00. Boiler load shed, valve and line repaired by 13:50. Area cleaned up with the assistance of contract vacuum truck.  Tom Roberts called DEP regional hotline to report the incident at 12:00.

09/02/04	Keystone	TV-03-00027 Sec. E #005	SO2 emissions in excess of 4.0 lbs/mmBtu: Units 1 and 2 - Hours: 2100/2300. (CEM monitored, not stack test results)	Reliant surmises that a relatively small amount of out-of-spec coal was delivered by a supplier that managed to circumvent fuel QA checks. Additional measures, including the potential elimination of problem suppliers, will be implemented by Key/Con Fuels (fuel manager for Keystone Station).
07/16/04	Conemaugh	TV 32-00059	On July 16, 2004, Unit 1 SO2 emissions during the period beginning 1500 hrs and ending 1759 hrs were 5044 lbs. Exceeding the 3-hr. permit limit of 4968 lbs.	During this period, the coal supply to Unit 1 was abnormal (higher sulfur & ash with lower HHV) resulting in scrubber chemistry problems. Station personnel took immediate corrective actions (increased DBA dosage, additional absorber pumps, more aeration, etc.) including reducing boiler load. Boiler load was not increased until the scrubber chemistry conditions returned to normal levels to comply with SO2 emission limits.
04/14/04	Shawville	17-00001. Section D for Source ID Nos. 031 & 032	Violations of PADEPs COMS data availability requirements for Unit Nos. 1 & 2 occurred during the 2nd Qtr 2002.	The PADEP proposed settlement of the 2nd Qtr. 2002 COMS data availability violations by "Consent Assessment of Civil Penalty." was signed by Reliant Energy Mid-Atlantic Power Holdings, LLC (owner) and Reliant Energy Northeast Management Company (operator) and returned to PADEP along with a check in the amount of \$4,000 on April 7, 2004. A fully executed copy of the agreement was returned to Reliant Energy on April 16, 2004 by the PADEP
3/29/04	Seward	32-00040 Section C Condition #001	Visible particulate emissions from #3 Ash Silo flanges.	DEP informed via call to Tim Kuntz. Duration 10:38 to 13:46 on 3/29/04. Problem corrected by sealing flanges.
01/31/04	Titus	06-05024 Section C Condition #011 for Source ID 033	On 01/31/04 excess stack opacity on Unit No. 3 was reported to PADEP because of a malfunctioning ash evacuation system on the ESP	Boiler load reduced and the malfunctioning ash evacuation system was corrected. The duration of the excess stack opacity was 25 minutes. Compliance is determined in accordance with the Department's enforcement policy for CEMS systems.
1/1/04	Portland Station	48-00006 Section D, for Source ID 103, Condition#012.	Although emissions were characterized in the annual AIMS report, there was failure to submit the CT-5 Annual Compliance Report by 01/30/03	Report for operating year 2003 was submitted to PADEP before 01/30/04. Internal permit tickler/tracking system has been updated to provide adequate reminders for timely future report submittals.

12/1/03	Keystone Station	TV-03-00027 Sec. E #005	SO2 emissions in excess of 4.0 lbs/mmBtu: Units 1 and 2 - Hours: 1200/1400, 1500/1700 and, 1800/2000. (CEM monitored, not stack test results)	Reliant surmises that a relatively small amount of out-of-spec coal was delivered by a supplier that managed to circumvent fuel QA checks. Additional fuel supplier surveillance has been implemented.
6/27/03	Portland Station	48-00006 Sect. D/#007 (2)	CT 5 operated on gas and no fuel sample was collected	Event Duration 35 minutes Gas operation was unscheduled and unintentional. Samples are normally collected.
2/26/03	Seward Station	TV-32-00040 Sect. C/#001	Fugitive dust, which did not leave the property, was observed from flyash truck unloader	Event Duration 1130-1530 Unloader settings adjusted to correct problem.
02/17/03	Keystone Station	TV-03-00027 Sect. C/#001	Fugitive dust, which did not leave the property, was observed from the accidental spill of flyash from the Unit No. 1 precipitator hopper	The flyash (approximately 100 tons) was gathered and disposed of at the ash disposal area within 2-3 hours of the spill.
1/29/03	Seward Station	TV-32-00040 Sect. C/#001	Fugitive dust, which did not leave the property, was observed from the accidental spill of flyash from the Boiler 15 dust hopper	About 20 tons of flyash was mistakenly spilled and immediately cleaned up.  No report was made.
1/13/03	Seward Station	TV-32-00040 Sect. C/#002	Fugitive Dust from Construction Site Noticed and Reported To Greensburg District office	Event Duration 0900-1800 Immediate steps taken by contractor greatly diminished problem within 2 hours.
7/30/02, 8/9/02, 12/11/02	Titus Station	Section C/#009	Failure to complete daily inspection (partial inspection completed)	Inspections rescheduled

10/01/02 – 10/02/02	Warren Station	TV-62-00012 Section D Source ID 035 II/Cond. #006b)	NOx emissions tests of the combustion turbine while firing fuel oil were not performed by 09/30/02 because of catastrophic failure of the fuel oil pump and subsequent fuel flow divider system leaks	Installation of a replacement fuel oil pump was completed on 09/27/02. The NOx tests were attempted on 09/30/02 but fuel flow divider system leaks developed requiring immediate removal of the combustion turbine from service. Station personnel repaired the leaks by 10/02/02. The NOx tests while firing fuel oil were successfully completed on 10/02/02.
07/08/02 07/18/02	Seward Station	TV-32-00040 Sect. C/#002	Fugitive dust, which did not leave the property, was observed from the flyash silo due to low water conditioning of the flyash during silo unloading.	07/08/02 duration – 10 minutes 07/18/02 duration – 5 minutes Took immediate action by reducing the rate of flyash flow to the water conditioning chamber of the flyash silo. Water spray nozzles in the conditioning chamber were inspected and repaired on July 25, 2002.
04/15/02	Portland Station	Sec. D/#007(b)(2)	No pipeline natural gas sample was gathered during unit operation (5 minutes only) on 04/15/02	The 5 minute run time on 04/15/02 was too brief to conduct fuel sampling
04/09/02	Shawville Station	TVOP 17- 00001 Sec. C/#001	Fugitive dust, which did not leave the property, was observed from the lime silo bag filter housing due to a crack which developed during silo loading.	Lime silo loading was stopped and the cracked bag filter housing was repaired.
09/19/01 11/19/01 02/01/02 02/05/02	Seward Station	Sect. C/#002	Fugitive dust observed from remediation activities due to high winds and dry conditions.	Water trucks were in continuous service. Observed incidents reported via telephone to Greensburg District office, except 02/01/02 when PADEP was actually on-site. Dust Action list plan was submitted to PADEP on 02/13/02 to address fugitive particulate emissions from the remediation/construction areas of the plant
11/25/01	Titus Station	Section C/#009	No documentation of daily emission inspection occurring on 11/25/01	Daily inspection requirements have been reemphasized to cognizant personnel.
09/11/01	Portland Station CT-5	Section B/#023 (b)(2)	Fuel sampling deviation identified above 06/29/01 was not included in Compliance Review Supplemental form submitted on 09/11/01	Details of reporting requirements have been reemphasized to cognizant personnel for future submittals

06/29/01	Portland Station CT-5	Sec. D/#007(b)(2)	No pipeline natural gas sample was gathered during unit operations on 06/29/01.	EPA policy (8/14/87) waives NSPS Subpart GG nitrogen content daily sampling for natural gas and permits custom fuel monitoring schedule (bimonthly/quarterly /semi-annually) for sulfur content sampling. The Station has prepared a petition to EPA for approval of the waiver/custom fuel monitoring schedule. In addition, the start-up procedure for CT-5 has been revised to emphasize the importance and requirement of sampling pipeline natural gas during unit operation.
11/19/01	Seward Station	Sect. C/#001	Fugitive dust observed from remediation activities due to high winds and dry conditions.	Water trucks were in continuous service. Observed incident reported via telephone to Greensburg District office.
9/18/01	Seward Station	Sect. C/#001	Fugitive dust observed from remediation activities due to high winds and dry conditions.	Water trucks were in continuous service. Observed incident reported via telephone to Southwest Regional office.
05/13/01	Seward Station	Sect. C/#001	Fugitive dust observed from coal auger sampling system and from small hole in ash hopper Nos. 2, 3, &4.	Repairs were made to these systems.
04/30/01	Warren Station	Sect. D/#019	Total NOx emissions (tpy) based on a 12-month consecutive period and the total NOx emissions (Lbs/mm Btu) based on a 30 day rolling average, and %S in oil were not included in the quarterly reports – 3 <sup>rd</sup> . & 4 <sup>th</sup> . Q 2000	Data for these 3 <sup>rd</sup> . and 4 <sup>th</sup> . Q 2000 included in the 1Q 2001 report.
08/03/00	Portland Station CT-5	Section B/#023 (b)(2)	Natural gas sampling deviations identified above on 01/07/00 and 01/30/00 not identified in Compliance Review Supplemental Form submitted in August 2000	The Title V Operating Permit issued on January 5, 2000 has been appealed. Section B/Condition #023 (b)(2) has been revised in the proposed settlement of the appeal. Details of reporting requirements have been reemphasized to cognizant personnel for future submittals

01/07/00 01/30/00 09/29/00	Portland Station CT-5	#48-00006 Section D Condition #007	No pipeline natural gas samples were gathered during unit operation on 1/07/00 and 1/30/00; the natural gas sample taken on 9/29/00 was not properly analyzed.	EPA policy (8/14/87) waives NSPS Subpart GG nitrogen content daily sampling for natural gas and permits custom fuel monitoring schedule (bimonthly/quarterly /semi-annually) for sulfur content sampling. The Station is in the process of preparing a petition to EPA for approval of the waiver/custom fuel monitoring schedule. In addition, the start-up procedure for CT-5 has been revised to emphasize the importance and requirement of sampling pipeline natural gas during unit operation. The 3 minute run time on 1/30/00 was too brief to conduct fuel sampling.
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**CONTINUING OBLIGATION:** Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional documented conduct occur or related parties develop between the date of submission and Department action on its application.

**AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW SUPPLEMENTAL FORM**

I **Matt E. Greek** being duly sworn according to the law depose and state, under penalty of law as provided in 18 Pa. C.S. §4944 and Section 9(b)(2) of the Air Pollution Control Act, 35 P.S. §4009(b)(2), that I am the representative of the Applicant/Permittee, identified above, authorized to make this affidavit. I further state that the information provided with this form, after reasonable inquiry, is true and complete to the best of my belief and that there are reasonable procedures in place to insure that documented conduct and deviations are identified and made part of the compliance review information contained in the Compliance Review Form,

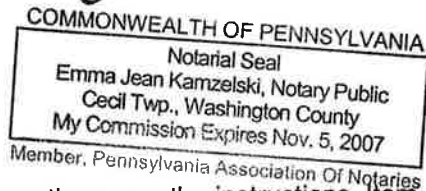
  
(Signature)

Name: **Matt E. Greek**  
(Print or Type Name)

Title: **Vice President, Gas and Oil Plant Operations**  
(Print or Type Title)

Sworn to and subscribed before me this

13 day of June, 192005  
  
Notary Public



\_\_\_\_\_  
Affix Corporate Seal

(For Corporations, see the instructions, Item 4, regarding corporate seal and signatures).



## ATTACHMENT 1

### Air Pollution Control Act Compliance Review Supplemental Form

The following table provides the Plan Approvals and Operating Permits of all facilities owned and/or operated by Reliant Energy Mid-Atlantic Power Holdings, LLC and/or Reliant Energy Northeast Management Company.

Note: On November 24, 1999, the transfer of ownership of all air permits for the following facilities became effective with the purchase and transfer of ownership of Pennsylvania Electric Company's and Metropolitan Edison Company's assets to Sithe Pennsylvania Holdings LLC. On May 12, 2000, Reliant Energy Power Generation completed the purchase of Sithe Pennsylvania Holdings LLC and renamed it Reliant Energy Mid-Atlantic Power Holdings, LLC.

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
Blossburg	CT	OP-59-0003 Reissued Change of Ownership requested 07/28/98	10-6-98 6-26-95	6-30-00*** 6-30-00
	Nitrogen Oxides Allowance Requirements	59-0003	12-31-98	12-31-03
	State Only Operating Permit	SMOP - 59-00007	10-07-03	09-30-08
Conemaugh	Title V Operating Permit	TV 32-00059 Renewal Application submitted 2-9-05	8-17-00	8-17-05
	Phase II Acid Rain Permit		1-1-03 12-30-97	12-31-07 12-31-02
	Nitrogen Oxides Allowance Requirements 2003-2005	32-00059	2-9-01	8-17-05
	Nitrogen Oxides Allowance Requirements 1999-2002	32-0059	12-31-98	12-31-03
	Auxiliary Boiler "A" Replacement	32-302-033A	10-3-97	10-3-02
		Requested Regular Operating Permit 06/09/97	7/15/96	6/30/97
	NH3 Gas Conditioning Boilers #1 & #2	32-306-010B	1-27-98	10-1-02
		Requested Regular Operating Permit 10-28-97	3-27-97	10-1-97
	Auxiliary Boiler B	32-302-034	1-31-94	9-30-98
		Requested Permit Renewal 08-10-93		
	Units #1 & #2 Scrubber	32-306-010A Operating Permit	8-5-99	8-5-04
		Requested Regular Operating Permit 01-31-97	11-1-96	2-1-97
		Requested Plan Approval Extension 09-25-96	5-23-96	9-30-96
		Plan Approval Extension requested 05-10-96 Authority to Operate Temporarily Under Plan Approval	12-1-95	5-12-96
	Unit #1 & #2 Gas Firing	32-306-012A Requested Regular Operating Permit 05-07-93	1-31-94	9-30-98

# ATTACHMENT 1

## Air Pollution Control Act Compliance Review Supplemental Form

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
	RACT Plan Approval	32-000-059 Operating Permit	8-5-99	8-5-04
		Requested Regular Operating Permit 01-31-97	10-24-96	2-1-97
		Requested Plan Approval Extension 09-25-96	6-10-96	10-1-96
		Requested Plan Approval Extension 05-30-96	2-28-96	6-1-96
		Requested Plan Approval Extension 01-29-96	11-29-95	1-31-96
		Requested Plan Approval Extension 09-15-95	6-15-95	9-30-95
		Requested Plan Approval Extension 05-26-95	12-29-94	5-31-95
Front Street	Nitrogen Oxides Allowance Requirements	25-0041	12-31-98	12-31-03
	RACT/ERC	25-0041	2-25-99	1-18-01
Gilbert Terminal		48-302-049GP	10-9-98	9-30-03
Hamilton	CT	01-2004	2-22-95	1-31-00***
	Nitrogen Oxides Allowance Requirements	01-2004	12-31-98	12-31-03
	State Only Operating Permit	01-05004	10-01-03	10-31-08
Reliant Energy Wholesale Generation, LLC	Plan Approval Extension	01-05029B	11-05-04	03-04-05
Note: On November 5, 2004 Reliant Energy Hunterstown, LLC merged into Reliant Energy Wholesale Generation, LLC.				
Reliant Energy Hunterstown, LLC	Plan Approval & Emission Reduction Credit (ERC) Transfer	01-2005	1-17-01	
	Plan Approval	01-05029	06-15-00	06-30-04
	*Plan Approval Extension	01-05029	08-19-04	12-15-04
	*Plan Approval Extension	01-05029	04-21-04	08-18-04
	*Plan Approval Extension	01-05029	12-24-03	04-20-04
	*Plan Approval Extension	01-05029	08-26-03	12-23-03
Hunterstown	CT	01-2005	2-22-95	1-31-00***
	Nitrogen Oxides Allowance Requirements	012005	12-31-98	12-31-03
Keystone	Title V Operating Permit	Title V Operating Permit	9-28-00	9-28-05
		Renewal Application submitted on April 5, 2005		

# ATTACHMENT 1

## Air Pollution Control Act Compliance Review Supplemental Form

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
	Title V Operating Permit Amendment for SCR	Title V Operating Permit	12-31-03	9-28-05
	Phase II Acid Rain Permit		1-1-03 12-30-97	12-31-07 12-31-02
	Nitrogen Oxides Allowance Requirements 2003-2005	03-00027	2-9-01	9-28-05
	Nitrogen Oxides Allowance Requirements 1999-2002	03-0027	12-31-98	12-31-03
	NH3 Flue Gas Cond.	Plan Approval 03-306-002 Operating Permit Issued	3-13-95	2-28-99
		Request for Permit to Operate 11-14-94	3-18-94	11-30-94
	RACT Plan Approval	03-000-027 Operating Permit Issued	8-5-99	8-5-04
		Requested Regular Operating Permit 05-16-97	2-10-97	6-1-97
		Requested Plan Approval Extension 01-31-97	11-1-96	2-1-97
		Requested Plan Approval Extension 09-25-96	6-10-96	10-1-96
		Requested Plan Approval Extension 05-30-96	2-28-96	5-31-96
		Requested Plan Approval Extension 01-29-96	11-29-95	1-31-96
		Requested Plan Approval Extension 09-15-95	6-15-95	9-30-95
	SCR Plan Approval	PA-03-00027A	6-14-01	12-31-03
Mountain	CT	01-2010	2-22-95	1-31-00***
	Nitrogen Oxides Allowance Requirements 2003-2005	21-2010	2-9-01	2-9-06
	Nitrogen Oxides Allowance Requirements 1999-2002	01-2010	12-31-98	12-31-03
	State Only Operating Permit	21-05010	08-13-03	08-31-08
Orrtanna	CT	01-2006	2-22-95	1-31-00***
	Nitrogen Oxides Allowance Requirements	01-2006	12-31-98	12-31-03

**ATTACHMENT 1**  
**Air Pollution Control Act Compliance Review Supplemental Form**

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
	State Only Operating Permit	21-05006	09-25-03	09-30-08
Reliant Energy, Portland, LLC	Plan Approval & Emission Reduction Credit (ERC) Transfer	48-00006	1-17-01	
Portland	Title V Operating Permit	Revised Title V Operating Permit Issued	3-16-01	1-31-05
		Revised Title V Operating Permit Issued	2-16-01	1-31-05
		Revised Title V Operating Permit Issued	1-9-01	1-31-05
		Revised Title V Operating Permit Issued	12-22-00	1-31-05
		Title V Operating Permit Effective (Appealed)	1-31-00	1-31-05
		Renewal Application submitted 7-29-04		
	Phase II Acid Rain Permit		1-1-03 12-30-97	12-31-07 12-31-02
	Unit No. 5	48-328-001A Plan Approval Extension	8-24-00	12-31-00
		Requested Plan Approval Extension 8-11-00		
		Plan Approval Extension	4-28-00	8-30-00
		Requested Plan Approval Extension 4-14-00		
		Plan Approval Extension	1-30-00	4-30-00
		Requested Plan Approval Extension 12-22-99		
		Requested Regular Operating Permit 12-22-99		
		Plan Approval Extension	9-17-99	1-31-00
		Requested Regular Operating Permit 10-17-96		
		48-328-001A	6-26-96	11-29-96
		48-328-001	12-14-95	3-29-96
	Nitrogen Oxides Allowance Requirements 2003-2005	48-00006	2-9-01	1-31-05
	Nitrogen Oxides Allowance Requirements 1999-2002	48-0006	12-31-98	12-31-03
	Station RACT	48-0006	4-16-97	8-31-01

**ATTACHMENT 1**  
**Air Pollution Control Act Compliance Review Supplemental Form**

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
Seward	Title V Operating Permit	TV 32-00040  Requested change of ownership to Reliant Energy Seward, LLC 9-20-04. Permit Amended 12-23-04  Renewal Application submitted on April 1 2005	9-19-00	9-19-05
	Phase II Acid Rain Permit		1-1-03 12-30-97	12-31-07 12-31-02
	Nitrogen Oxides Allowance Requirements 2003-2005	32-00040	2-9-01	9-19-05
	Nitrogen Oxides Allowance Requirements 1999-2002	32-0040	12-31-98	12-31-03
	Boiler 15	32-306-005  Requested Permit Renewal 7-13-94	7-31-94  7-13-89 8-10-87	7-31-99  7-31-94 7-31-89
	Auger Samp. Collec.	32-305-37	5-31-94	5-31-99
	RACT	32-000-040 RACT Operating Permit	12-12-97	12-12-02
	Boiler #15 SCR/SNCR	PA-32-040A  Requested Regular Operating Permit 5-24-00  Requested Plan Approval Extension 5-24-00  Requested Plan Approval Extension 01-27-00  Requested Plan Approval Extension 08-23-99  Requested Plan Approval Extension 04-28-99  Requested Plan Approval Extension 12-21-98  Requested Plan Approval Extension 07-16-98  Plan Approval Extension Requested 03-23-98	5-31-00	9-30-00
			2-18-00	5-31-00
			9-27-99	1-31-00
			6-1-99	9-1-99
			1-13-98	5-1-99
			8-5-98	12-1-98
			5-7-98	7-31-98
			3-27-97	3-31-98
	Repowering Plan Approval	PA-32-040B	4-23-01	4-23-06
		Requested Plan Approval Extension 6-16-04	6-22-04	11-5-04
		Requested Plan Approval Extension 10-1-04	11-5-04	2-10-05
		Requested Plan Approval Extension 1-26-05	2-10-05	6/10/05

**ATTACHMENT 1****Air Pollution Control Act Compliance Review Supplemental Form**

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
		Requested Plan Approval Extension 5-16-05		
Shawnee CT	State Only (Synthetic Minor) Operating Permit	45-00003	2-23-01	2-28-06
	CT	45-0003	5-25-95	8-31-99***
	Nitrogen Oxides Allowance Requirements	45-0003	12-31-98	12-31-03
Shawville	Plan Approval & Emission Reduction Credit (ERC) Transfer	17-00001A	1-17-01	
	Title V Operating Permit	Revision #1	02-15-03	10-31-05
		17-00001	11-7-00	10-31-05
	Phase II Acid Rain Permit	17-00001	1-3-03	12-31-07
			1-1-98	12-31-02
	Nitrogen Oxides Allowance Requirements 2003-2005	17-00001	2-9-01	10-31-05
	Nitrogen Oxides Allowance Requirements 1999-2002	17-0001	12-31-98	12-31-03

# ATTACHMENT 1

## Air Pollution Control Act Compliance Review Supplemental Form

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
	RACT Plan Approval	PA-17-0001		
		Minor Operating Permit Mod.	2-10-00	6-30-04
		Minor Operating Permit Modification 12-9-99		
		Appeal Operating Permit 07-19-99		
		Operating Permit Issued	6-15-99	6-30-04
		Request Regular Operating Permit 04-14-99		
		Request Plan Approval Extension 04-14-99		
		Reissued	10-6-98	4-4-99
		Change of Ownership Requested 07-28-98		
		Request Plan Approval Extension 04-30-98	1-9-98	5-9-98
		Request Plan Approval Extension 12-30-97	9-12-97	1-10-98
		Request Plan Approval Extension 09-08-97	5-7-97	9-4-97
		Request Plan Approval Extension 05-02-97	1-7-97	5-7-97
		Request Plan Approval Extension 12-19-96	9-9-96	1-7-97
		Request Plan Approval Ext. for NOx emission limit "reset" 08-23-96	3-18-96	7-16-96
		Request for Permit to Operate 06-20-96	11-20-95	3-20-96
		Request for Plan Approval Extension 03-05-96	7-25-95	11-22-95
		Plan Approval Extension Requested 11-07-95		
		Plan Approval Extension Requested 07-18-95		
		Clarification Letter	2-15-95	6-25-95
		Issued	12-27-94	6-27-96
	Boilers 1 & 2	17-306-001 Reissued	10-6-98	6-30-00***
		Change of Ownership Requested 07-28-98	6-4-93	6-30-98
	Boilers 3 & 4	17-306-002B Reissued	10-6-98	6-30-00***
		Change of Ownership Requested 07-28-98	6-4-93	6-30-98

# ATTACHMENT 1

## Air Pollution Control Act Compliance Review Supplemental Form

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
	Ash Disposal Facility	Plan Approval 17-399-011 Reissued	10-6-98	6-30-00***
		Change of Ownership Requested 7/28/98		
		Operating Permit Issued	8-30-95	8-31-00
		Operating Permit Requested 06-30-95		
	Ash Disposal Site Expansion	17-00001A	7-22-02	12-31-03
		Request Plan Approval Extension 12-10-03	12-22-03	10-16-04
		Request Plan Approval Extension 10-1-04		
		Request Title V Administrative Amendment 11-15-05		
Titus	Title V Operating Permit	06-05024	Effective 8-1-00	7-31-05
		Renewal Application Submitted 1-25-05		
	Nitrogen Oxides Allowance Requirements 2003-2005	06-1024	2-9-01	7-31-05
	Nitrogen Oxides Allowance Requirements 1999-2002	06-1024	12-31-98	12-31-03
	Phase II Acid Rain Permit		1-1-04	12-31-08
			12-30-97	12-31-03
	RACT	06-1024	12-9-96	12-31-01
	Coal Handling System Plan Approval	06-5024A	2-4-02	3-31-03
		Request Plan Approval Extension 2-20-03	4-1-03	6-30-04
		Request Plan Approval Extension 6-11-04	7-1-04	11-30-04
		Commence Operation on 9-29-04	9-29-04	3-28-05
	New Stack Plan Approval	06-5024B	3-17-03	11-30-04
		Commence Operation on 10-19-04	10-19-04	04-25-05
		Administrative Amendment Request 1-25-05		
Tolna	CT	67-2028	2-22-95	1-31-00***
	Nitrogen Oxides Allowance Requirements 2003-2005	67-2028	2-9-01	2-9-06



# ATTACHMENT 1

## Air Pollution Control Act Compliance Review Supplemental Form

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
	Nitrogen Oxides Allowance Requirements 1999-2002	67-2028	12-31-98	12-31-03
	State Only Operating Permit	67-05028	08-26-03	08-31-08
Warren	Title V	Revised Title V Operating Permit issued Title V Operating Permit Effective Renewal Application Submitted 10-25-04	11-21-01 6-1-00	4-30-05 4-30-05
	Phase II Acid Rain Permit		1-1-03 12-30-97	12-31-07 12-31-02
	Nitrogen Oxides Allowance Requirements 2003-2005	62-00012	2-9-01	5-30-05
	Nitrogen Oxides Allowance Requirements 1999-2002	62-0012	12-31-98	12-31-03
	RACT Approval	OP-62-012A Appeal Operating Permit 05-28-99 OP-62-012A Withdraw Appeal Appeal Operating Permit 07-12-96 OP-62-012	1-20-00  4-9-99 9-29-96  6-6-96	Open  None   Open
	Boilers 1 – 4	62-306-001 (revised)	4-27-99	4-27-04
		62-306-001	1-1-93	12-31-97
	Auger Samp. Collect.	62-399-005	7-1-93	6-30-98
	Title V	TV-20-00265 Title V Operating Permit Effective	6-11-98	6-30-03
Wayne		TV-20-00265 Reissue	06-13-03	05-31-08
	Nitrogen Oxides Allowance Requirements 2003-2005	20-00265	2-9-01	6-30-03
	Nitrogen Oxides Allowance Requirements 1999-2002	20-00265	12-31-98	12-31-03

**ATTACHMENT 1****Air Pollution Control Act Compliance Review Supplemental Form**

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
		OP-20-000 Revised	12-1-97	Open
Williamsburg	Nitrogen Oxides Allowance Requirements	07-2006	12-31-98	12-31-03
<p>* New Permits</p> <p>*** Included in Title V/State Only (Synthetic Minor) Operating Permit applications. PaDEP authorized continued operations until issuance of Title V/State Only (Synthetic Minor) permit.</p>				

# **ATTACHMENT A**

**Reliant Energy**

**Corporate Structure Diagram**

42-039-00047

04-06-19

no-jp



121 Champion Way  
Canonsburg, PA 15317  
Writer's Direct Dial Number  
724-597-8670

June 7, 2004

**Certified Mail**

Mr. Eric Gustafson  
Facilities Section Chief  
PA Department of Environmental Protection  
230 Chestnut Street  
Meadville, PA 16335-3481

Dear Mr. Gustafson:

***Subject: Title V Compliance Certification and 6-Month Deviation Report  
Wayne Station TV 20-00265***

In accordance with Section B, Condition # 023 & #024, Reliant Mid-Atlantic Power Holdings, LLC hereby submits the annual Compliance Certification Form for the Wayne Combustion Turbine, Permit TV 20-00265 along with the 6-Month Deviation Report (Compliance Review Supplemental Form). As directed by the Department's Mr. Ronald Gray, the 2-page Annual Compliance Certification form has been used for this submittal because of current updates to the new detailed forms.

If you have any questions concerning this matter, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Timothy E. McKenzie". The signature is stylized with a large, sweeping "M" and a long, horizontal flourish at the end.

Timothy E. McKenzie  
Senior Environmental Scientist

TEM/cms/TEM665R

cc: US. EPA Region III - Enforcement Program Section (3AP10)

**PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
**BUREAU OF AIR QUALITY**  
**COMPLIANCE CERTIFICATION FORM**

(25 Pa. Code § 127.513)



<b>Facility Name:</b>	Reliant Energy Mid-Atlantic Power Holdings, LLC - Owner and Operator	<b>Plant Name:</b>	Wayne Combustion Turbine
<b>Contact Person:</b>	Timothy E. McKenzie	<b>Title:</b>	Senior Environmental Scientist
<b>Operating Permit #:</b>	20-00265	<b>Phone Number:</b>	(724)-597-8670

For the period 06/11/03 – 06/04/04, Wayne Combustion Turbine has been in continuous compliance with all applicable requirements of permit # 20-00265 determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances and excursions:

Sect./Cond. #	Citation #	Source	Noncompliance	Monitoring Method(s)	Date	Duration	Corrective Action(s)

Certification of Truth, Accuracy and Completeness

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.

<b>Name:</b>	Matt E. Greek	<b>Title:</b>	Vice President Oil & Gas Plant Operations
<b>Signed:</b>		<b>Date:</b>	June 7, 2004

*This certification must be signed by a responsible official. Any certification submitted without a valid signature will be returned.*  
*The owner/operator shall identify any other material information needed in this certification to also comply with section 113(c)(2) of the Clean Air Act. If more spaces are needed, complete additional pages using the format shown in Addendum I. This certification does not replace requirements pertaining to the submission of malfunction and CEM reports. DO NOT include that information on this form.*



For the period 06/11/03 – 06/04/04, Wayne Combustion Turbine has been in continuous compliance with all applicable requirements of permit # 20-00265, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances and excursions:

[illegible]



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY

## AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW SUPPLEMENTAL FORM

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

Date of submission of original Compliance Review form: July 19, 1999

Type of Supplemental Compliance Review Form Submittal (check all that apply):

- |  |  |
|--|--|
| <input type="checkbox"/> Original Filing | <input checked="" type="checkbox"/> Amended Filing                             |
| <input type="checkbox"/> No Changes      | <input checked="" type="checkbox"/> Date of Last Compliance Review Form Filing |
|  | <b>December 18, 2003</b>   |

Type of Submittal:

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> New Plan Approval          | <input type="checkbox"/> New Operating Permit | <input type="checkbox"/> Renewal of Operating Permit                          |
| <input type="checkbox"/> Extension of Plan Approval | <input type="checkbox"/> Change of Ownership  | <input checked="" type="checkbox"/> Periodic Submission<br>(every six months) |
| <input type="checkbox"/> Other _____                |   |   |

A. General Applicant Information:

1. Name of Applicant/Permittee/ ("applicant") (non-corporations attach documentation of legal name):

Reliant Energy Mid-Atlantic Power Holding, LLC

Address: 121 Champion Way, Suite 200

Canonsburg, PA 15317

Telephone: (724)-597-8000

Taxpayer ID #: 52-2154847

**Permit**, Plan Approval or Application ID #: TV 20-00265 Wayne Station Title V Operating Permit

2. Identify the form of management under which the applicant conducts its business (check appropriate box):

- |  |  |                                      |
|--|--|--------------------------------------|
| <input type="checkbox"/> Individual          | <input type="checkbox"/> Fictitious Name                             | <input type="checkbox"/> Association |
| <input type="checkbox"/> Municipality        | <input type="checkbox"/> Partnership                                 | <input type="checkbox"/> Syndicate   |
| <input type="checkbox"/> Proprietorship      | <input type="checkbox"/> Limited Partnership                         |                                      |
| <input type="checkbox"/> Public Corporation  | <input type="checkbox"/> Government Agency                           |                                      |
| <input type="checkbox"/> Private Corporation | <input type="checkbox"/> Joint Venture                               |                                      |
| <input type="checkbox"/> Municipal Authority | <input checked="" type="checkbox"/> Other Type of Business (specify) |                                      |
|  | <b>Limited Liability Company</b>                                     |                                      |

3. Describe the type(s) of business activities performed:

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission

No Change

B. General Information Regarding "Applicant." If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
-----------	---------------------------------	---------------------------	-------------	------------------------------

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission

No Change

No Change

No Change

No Change

No Change

In February 2002, the assets of Orion Power Holdings, Inc were acquired by Reliant Resources, Inc. Refer to Attachment A to understand corporate relationships.



C. Specific information regarding the applicant and its "related parties:

1. Pennsylvania Facilities. List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Business	County and Municipality	Telephone No.	Relationship to Applicant
-----------	--------------------	----------------------------	---------------	------------------------------

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission

No Change

2. Provide the names and business addresses of all general partners of the applicant and parent corporation, if any.

Name	Business Address
------	------------------

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission

No Change

No Change

3. List the names and business of persons with overall management responsibility for the process being permitted (i.e., plant manager)

**Name**

**Business Address**

\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission

No Change

No Change

4. Plan Approvals or Operating Permits. List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time five years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

Source	Plan Approval Operating Permit Number	Location	Issuance Date	Expiration Date
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\*\*\* Supplemental \*\*\*

List only those changes since the date of the last original submission

See Amended Attachment 1

**Plan Approvals or Operating Permits**

D. Compliance Background:

(Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.)

1. List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit #	Nature of Documented Conduct	Type of Department Action	Status Litigation; Existing/Continuing; or Corrected/Date	Dollar Amount Penalty
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\* \* \* Supplemental \* \* \*

List only those changes since the date of the last original submission.

No Change

**CONTINUING OBLIGATION:** Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional documented conduct occur or related parties develop between the date of submission and Department action on its application.

2. List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

Date	Location	Plan Approval/ Operating Permit #	Nature of Deviation	Incident Status: Existing/Continuing; or Corrected Date
*** Supplemental ***				
List only those changes since the date of the last original submission				
04/14/04	Shawville	17-00001. Section D for Source ID Nos. 031 & 032	Violations of PADEPs COMS data availability requirements for Unit Nos. 1 & 2 occurred during the 2nd Qtr 2002.	The PADEP proposed settlement of the 2nd Qtr. 2002 COMS data availability violations by "Consent Assessment of Civil Penalty." was signed by Reliant Energy Mid-Atlantic Power Holdings, LLC (owner) and Reliant Energy Northeast Management Company (operator) and returned to PADEP along with a check in the amount of \$4,000 on April 7, 2004. A fully executed copy of the agreement was returned to Reliant Energy on April 16, 2004 by the PADEP
1/1/04	Portland Station	48-00006 Section D, for Source ID 103, Condition#012.	Although emissions were characterized in the annual AIMS report, there was failure to submit the CT-5 Annual Compliance Report by 01/30/03	Report for operating year 2003 was submitted to PADEP before 01/30/04. Internal permit tickler/tracking system has been updated to provide adequate reminders for timely future report submittals.
12/1/03	Keystone Station	TV-03-00027 Sec. E #005	SO2 emissions in excess of 4.0 lbs/mmBtu: Units 1 and 2 - Hours: 1200/1400, 1500/1700 and, 1800/2000. (CEM monitored, not stack test results)	Reliant surmises that a relatively small amount of out-of-spec coal was delivered by a supplier that managed to circumvent fuel QA checks. Additional fuel supplier surveillance has been implemented.
6/27/03	Portland Station	48-00006 Sect. D/#007 (2)	CT 5 operated on gas and no fuel sample was collected	Event Duration 35 minutes Gas operation was unscheduled and unintentional. Samples are normally collected.
2/26/03	Seward Station	TV-32-00040 Sect. C/#001	Fugitive dust, which did not leave the property, was observed from flyash truck unloader	Event Duration 1130-1530 Unloader settings adjusted to correct problem.